MCELROY, DEUTSCH, MULVANEY & CARPENTER, LLP

1300 Mt. Kemble Avenue P.O. Box 2075 Morristown, New Jersey, 07962-2075 (973) 993-8100

Attorneys for Defendant, National Union Fire Insurance Company of Pittsburgh, PA

## UNITED STATES DISTRICT COURT FOR THE DISCTRICT OF NEW JERSEY

NEW JERSEY TITLE INSURANCE COMPANY,

Plaintiff,

VS.

NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, and BROWN & BROWN OF CONNECTICUT, INC., d/b/a DILL, JOYCE & THRESHER INSURANCE,

Defendants.

CIVIL ACTION NO. 11-civ-630-DMC-JAD

## APPLICATION FOR EXTENSION OF TIME TO ANSWER

Application is hereby made, pursuant to Local Rule 6.1(b), for a Clerk's Order extending the time within which Defendant, National Union Fire Insurance Company of Pittsburgh, PA (improperly plead as National Union Fire Insurance Company of Pittsburgh), may answer or otherwise respond to the Complaint filed by Plaintiff herein. In support of this application, it is represented that:

1. No previous extension of time to file an Answer or otherwise respond has been obtained.

- 2. Service of Process was effected on February 28, 2011.
- 3. National Union Fire Insurance Company of Pittsburgh, PA's current time to answer expires on March 21, 2011.

Respectfully submitted,

MCELROY, DEUTSCH, MULVANEY & CARPENTER, LLP Attorneys for Defendant, National Union Fire Insurance Company of Pittsburgh, PA

By: Kirling & Mills

## **ORDER**

The above application is **GRANTED** and National Union Fire Insurance Company of Pittsburgh, PA's time to answer or otherwise respond is extended to April 4, 2011.

ORDER DATED: \_\_\_\_\_ of \_\_\_\_\_, 2011

WILLIAM T. WALSH, Clerk

By: \_\_\_\_\_\_\_

Deputy Clerk